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DEPARTMENT OF AGRICULTURE

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BLM Wind Energy Programmatic EIS
Argonne National Laboratory, EAD/900
9700 S. Cass Avenue
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Re: Comments on the Draft Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States

The Idaho State Department of Agriculture (ISDA) appreciates the opportunity to comment on the Draft Programmatic Environmental Impact Statement on Wind Energy Development on BLM-Administered Lands in the Western United States (DEIS). One of the primary goals of the Rangeland Management Program of the ISDA is to provide support and expertise to Idaho livestock producers in rangeland planning and practices on both state and federal lands. Our comments are directed to this end; to ensure the best available range science is used as related to wind energy development and the development of the Final EIS.

In general, the DEIS is a thorough evaluation of the environmental impacts of wind energy development. There are some revisions and additions ISDA proposes the Bureau of Land Management (BLM) make to the DEIS that fall within the scope of the proposed action.

Chapter 2: Proposed Action and Alternatives

2.2.3.1 Proposed Policies

ISDA is pleased to see that under the proposed policies section, livestock grazing is included in the list of land use practices that will, to the extent possible, not be prevented by wind energy projects. We also appreciate the BLM's willingness to "incorporate management goals and objectives specific to habitat conservation" for the potential impacts wind energy projects may have on sage-grouse habitat, as well as other species of concern. Sage-grouse habitat management and livestock grazing are at the forefront of the current range issues and will be addressed later in this letter.

2.2.3.2 Plan of Development Preparation

ISDA endorses the DEIS's incorporation of adaptive management strategies in the monitoring program and Best Management Practices (BMPs) for the proposed action. This will give the BLM the necessary flexibility if management strategies need to be changed. However, the DEIS does not specify a time frame for how long these monitoring programs will need to continue into each project. The language used, such as "environmental conditions" and "each environmental resource" is also vague in what the monitoring plan will be required to monitor. We recommend giving a specific length of time monitoring should occur, and identify which "conditions" and "resources" should be monitored, in order to avoid confusion in the Final EIS. Specific, comprehensive-monitoring plans will be critical in measuring the success of habitat restoration efforts following disturbances.

We support the BLM's proposed BMPs for the proposed action to minimize potential adverse impacts of wind energy development, especially the incorporation of "scientifically rigorous avian...surveys." We also endorse the designs of facilities to reduce perching and nesting by raptors and ravens in order to mitigate predation on sage-grouse.

The BMPs for noxious weeds and pesticides are incomplete. The DEIS, under the sub-heading "Noxious Weeds and Pesticides," states, "Operators should develop a plan for control of noxious weeds and invasive species, which could occur as a result of new surface disturbance activities *at the site*." (Italics added for emphasis) ISDA feels operators must be required to develop a plan to control weeds resulting from new project activities. New infestations of invasive species have great potential to negatively affect the resource and plans must be in place for immediate control. Additionally, this statement does not recognize the possibility of new infestations from disturbances away from the site, such as new roads and transmission line right-of-ways (ROWs). ISDA recommends that this BMP recognize the possibility of new weed infestations on newly constructed roads and ROWs. Also, vehicles and other construction equipment should not only be washed prior to arrival at the project site, as outlined in the BMP, but after leaving the site, too, if noxious weeds are present. The principles of Integrated Weed Management (IWM) should also be incorporated into the BMP's. IWM will be discussed in more detail below.

2.2.3.2.3 Construction

ISDA supports the BLM's plan to use weed-free grasses, forbs, and shrubs in all areas of disturbed soil.

Chapter 4: Affected Environment

4.3.2 Surface Water

The Programmatic Draft DEIS states, "The presence of both permanent and ephemeral surface water bodies would need to be assessed at the project level, along with...water use by both humans and wildlife..." This statement neglects to mention livestock as water users. Permanent and ephemeral surface water bodies on BLM land are critical to livestock management and distribution and must be recognized as such in the Final EIS.

4.7.1 Management of BLM-Administered Lands

ISDA is concerned about the lack of attention the DEIS gives to livestock grazing as a major use of BLM land. The first sentence of this section only mentions, "cattle grazing" while not recognizing other types of livestock grazing. We suggest changing the phrase to read, "livestock grazing."

Also, when listing BLM's management responsibilities under the multiple-use framework, livestock grazing isn't included with energy and mineral development, and timber sales as a commercial activity. The BLM administers 18,000 grazing permits on 160 million acres of its land. Grazing should receive more attention and be listed with the other commercial activities because its prominence as a major use of public lands.

Chapter 5: Potential Impacts of Wind Energy Development and Analysis of Mitigation Measures

5.9.2.1.1 Direct Injury of Loss during Clearing, Grading, and Facility Construction

This section is somewhat confusing as it contradicts itself with two different claims. The DEIS states, "Impacts to vegetation along transmission lines and staging areas would be temporary, with vegetation expected to regenerate following completion of construction activities." The last sentence of this section then says, "Nevertheless, it could take several years for temporarily affected areas to recover...and some types of habitat

may never fully recover from disturbances." (Italics added for emphasis) Please clarify exactly what type of impacts these temporary activities will have on soil and vegetation.

5.9.2.1.4 Introduction of Invasive Species

ISDA appreciates the BLM's attention to the potential problems invasive vegetation will present as a result of construction activities associated with wind energy development. However, the list of adverse effects from invasive species is incomplete as are the mitigation measures outlined.

The BLM must analyze the potential negative impacts of wildfire due to increased invasive species in disturbed areas. Wildfire and conversion of native shrub-steppe ranges to annual grasses are listed as the primary threats to a number of sensitive plant and animal species. Failure to address this issue would be a significant over-site.

Another adverse affect of invasive species is economic in nature. ISDA estimates the direct cost of noxious weeds on Idaho's public and private lands at an annual amount of \$300 million. Unsuccessful mitigation of new invasive vegetation species infestations will increase these costs.

The DEIS recognizes that "establishment of invasive vegetation may be limited by early detection and subsequent eradication of the plants." Early detection, however, is only one part of Integrated Weed Management (IWM). ISDA supports and recommends integrating the use of IWM into the mitigation measures for invasive vegetation in the DEIS. IWM is the use of all available and feasible weed control techniques in an organized, coordinated, and mutually supportive manner. Idaho's Strategic Plan for Managing Noxious Weeds states:

"[IWM] is the best method for reducing the ecological, economic and social impacts of noxious weed on the state's human and natural resources. To accomplish this, the supporters and cooperators will incorporate resources, priorities and strategies of federal, state, and county agencies into a unified approach to halt or slow the spread of noxious weeds across Idaho (pp. 3-4)."

The IWM principles should also be incorporated into the BMPs as outlined in Chapter 2.

5.9 Ecological Resources

Pg. 5-72 Compatibility of a Wind Energy Development Project and Gallinaceous Birds

Though the DEIS does acknowledge that energy-related facilities should be located away from active leks and sage-grouse habitat, when possible, there is not a specific distance mentioned. ISDA recommends incorporating the recommendations in Connelly et al. (2000) that energy related facilities should be located greater than 3.2 km from active leks whenever possible.

ISDA also believes that the suggested mitigation measures are lacking in protecting sage-grouse against any adverse impacts from wind energy development. Except for the very general BMP guidelines to develop a monitoring plan in Chapter 2, there are no specific measures within the DEIS to monitor sage-grouse population and habitat vegetation when sage-grouse habitat is disturbed through development. Monitoring should be a critical component of the mitigation measures, especially at the project site, and where new roads and ROWs are constructed. Monitoring should also occur in areas that are rehabilitated, and where mitigation measures take place at off-site locations to offset unavoidable sage-grouse habitat alteration and reduction at the project site. This recommendation is supported by the U.S. Fish and Wildlife Service (2003). Specific monitoring schemes should be incorporated into the adopted adaptive management strategies regarding wind energy development as outlined in section 6.1.2 of the DEIS.

5.9.5 Mitigation Measures

The DEIS does not adequately address mitigation measures for the impact of OHV use.

As properly acknowledged in section 6.4.1.10 of the DEIS, OHV use will increase in wind energy development project areas, especially when new access roads and transmission line ROWs are built and maintained. The presence of OHVs will increase the spread of noxious weeds, disturbance to wildlife, potential increase in fire starts, and soil compaction and erosion. With the increased OHV use, it will be difficult for ranchers with livestock grazing permits to follow their livestock management plans, through gates being left open, fences cut, and livestock harassed.

ISDA recommends the BLM acknowledge these impacts in the Final EIS and develop measures to mitigate OHV use in these areas. For example, signing, gating, and increased enforcement.

5.9.5.3.5 Mitigating Establishment of Invasive Vegetation

This section, as well as all other phases of wind energy development, should include the Integrated Weed Management (IWM) principles as outlined above.

Aside from inspecting and cleaning construction equipment that may have entered invasive species infestations, all personnel vehicles, shoes, and clothing should be inspected and cleaned as well.

5.10 Land Use

In this section, there is a lack of discussion on the impacts, both direct and cumulative, that wind energy development can have on livestock grazing on BLM administered lands. ISDA understands that wind energy, in the long term, may create only a small ecological footprint and can be compatible with land uses such as livestock grazing, however, we believe that it could potentially have a much larger impact than the DEIS acknowledges.

The DEIS assumes that for each wind turbine tower, only an acre or less of land is impacted. The DEIS does not take into consideration new or improved roads and it assumes that habitat disturbed during construction will be rehabilitated successfully. New roads and failed rehabilitation projects will permanently reduce the forage base on BLM grazing allotments. In the example given in the DEIS on pg. 5-85, only 118 out of 7,000 acres of rangeland in the project area were permanently impacted. This example does not break down the impacts on a per allotment basis. 188 acres of forage lost on a grazing allotment of less than 7,000 acres could have a significant impact on how that allotment is managed; especially if the acreage of lost forage due to new roads and failed restoration projects are taken into consideration. Additionally, there is no analysis of the potential increase in fire starts and subsequent loss of forage and disruption of grazing allotment management. These impacts should be acknowledged in the Final EIS.

On pg. 5.57, the DEIS acknowledges that cattle will cluster around turbines. The DEIS does not take into account the impact this could have on management of grazing allotments and the subsequent costs that may be incurred because of it. In order to keep livestock from congregating around the towers, new range improvements may need to be built, such as fences. Or, the permittee may need to employ additional help in herding livestock away from turbines to keep them from overgrazing the area. ISDA recommends the BLM acknowledge the potential increased cost that ranchers may incur because of wind energy development and the potential impacts from cattle that cluster around turbines in the Final EIS.

Chapter 6: Analysis of the Proposed Action and Its Alternatives

6.4 Cumulative Impacts

The DEIS, in this section, acknowledges that land uses like livestock grazing "...would generally be compatible..." The DEIS, however, fails to recognize some important cumulative impacts that wind energy development could potentially have on livestock grazing on public lands.

Livestock management has already changed significantly on public lands because of the decline in sage-grouse populations. Ranchers have made major concessions and have incurred substantial costs in changing their operations in order to better preserve sage-grouse populations and habitat. This has happened in spite of the lack of direct evidence that livestock have contributed to sage grouse population decline (Connelly et al. 2000). For example, ranchers have had to invest in new fences and have changed grazing systems in order to better protect breeding and brood-rearing sage-grouse habitat.

Sage grouse need large tracts of contiguous, undisturbed areas of high-quality habitat during their four distinct seasonal periods. Wind turbines energy development, as acknowledged in the DEIS, could have a potential impact on sage-grouse populations by fragmenting these large tracts of habitat through increased presence of invasive species, increased incidence of wildfire, and increased human activity. More research is needed to determine the impact wind energy development will have on sage-grouse (USFWS 2003). If sage-grouse habitat is altered by wind energy development, the trickle-down effect will require ranchers who hold BLM grazing permits to make even more concessions and will incur greater operating costs. The BLM must recognize these cumulative impacts in the Final EIS.

Again, we appreciate the opportunity to provide comments and suggestions to the DEIS. If there are any questions, please feel free to contact Kevin Wright at (208) 736-3073.

Sincerely,

John Chatburn
Deputy Administrator
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ISDA

Literature Cited

Connelly, J.W., et al., 2000, "Guidelines to Manage Sage Grouse Populations and Their Habitats," *Wildlife Society Bulletin* 28(4):967-985.

USFWS (U.S. Fish and Wildlife Service), 2003a, *Interim Guidelines to Avoid and Minimize Wildlife Impacts from Wind Turbines*, U.S. Department of the Interior, Wind Turbine Siting Working Group, Washington, D.C. Available at <http://www.fws.gov/r9dhcbfa/wind.pdf>. Accessed October 29, 2004.